

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

(Alexandria Division)

THOMAS PORTER, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	C.A. #1:14-cv-1588 (LMB/IDD)
	)	
HAROLD C. CLARKE, <i>et al.</i> ,	)	
	)	
Defendants.	)	

PLAINTIFFS' SECOND NOTICE OF SUPPLEMENTAL AUTHORITY  
IN SUPPORT OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs Thomas Porter, Ricky Gray, Anthony Juniper, and Mark Lawlor, by counsel, respectfully submit the attached authority in support of their pending motion for summary judgment: New York Times Editorial Board, "President Obama Speaks Out on Solitary," *The New York Times*, Feb. 2, 2016 (available on line at <http://www.nytimes.com/2016/02/02/opinion/president-obama-speaks-out-on-solitary.html?emc=eta1>). This authority is being filed the day it has been published.

Plaintiffs submit this editorial and the United States Department of Justice Fact Sheet referenced therein in support, *inter alia*, of the court's assessment of the evolving standards of decency pertinent to its adjudication of plaintiffs' pending motion for summary judgment.

Respectfully submitted,

THOMAS PORTER, *et al.*,

By counsel

Dated: February 2, 2016

Counsel for Plaintiffs:

//s// Victor M. Glasberg

Victor M. Glasberg, #16184

Maxwelle Sokol, #89589

Victor M. Glasberg & Associates

121 S. Columbus Street

Alexandria, VA 22314

(703) 684-1100 / Fax: 703-684-1104

[vmg@robinhoodsq.com](mailto:vmg@robinhoodsq.com)

PorterThomas\Pleadings\MemMExClarification

Parker S. Thomson

Hogan Lovells US LLP

600 Brickell Avenue

Miami, Florida 333131

(303) 459-6500

[parker.thomson@hoganlovells.com](mailto:parker.thomson@hoganlovells.com)

Kathryn Marshall Ali (*pro hac vice*)

Hogan Lovells US, LLP

555 Thirteenth Street, N.W.

Washington, D.C. 20004

(202) 637-5600 / fax 202-637-5910

[kathryn.ali@hoganlovells.com](mailto:kathryn.ali@hoganlovells.com)

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Certificate of Service

I, Victor M. Glasberg, hereby certify that on this 2<sup>nd</sup> day of February 2016, I electronically filed the foregoing Plaintiffs' Second Notice of Supplemental Authority In Support of Plaintiffs' Motion for Summary Judgment with the clerk of the court.

//s// Victor M. Glasberg

Victor M. Glasberg, #16184

Victor M. Glasberg & Associates

121 S. Columbus Street

Alexandria, VA 22314

(703) 684-1100 / Fax: 703-684-1104

[vmg@robinhoodsq.com](mailto:vmg@robinhoodsq.com)

Counsel for Plaintiffs